

EXHIBIT U

From: Aaron Cera
To: Stameshkin, Liz; Holden Benon; Ghazarian, Colette A; Lauter, Judd; Ghajar, Bobby A.; adunning@cgsh.com; Kathleen Hartnett; Biksa, Liene; Alvarez, Jessica; mlemley@lex-lumina.com
Cc: Joe Saveri; Cadio Zirpoli; Christopher Young; James Ulwick; Amy Keller; Ruby Ponce; Margaux Poueymirou; Elissa A. Buchanan; Ashleigh Jensen; Heaven Haile; Rya Fishman; Matthew Butterick; Bryan L. Clobes; Alexander Sweatman; Mohammed Rathur; dmuller@venturahersey.com; Nada Djordjevic; David Straite
Subject: Re: Kadrey v. Meta: Disclosure of Data Sources
Date: Thursday, October 31, 2024 11:00:39 AM
Attachments: [Outlook-3s2j4tu2.png](#)
[Outlook-lo3y1r4n.png](#)

Counsel,

Pardon the double email.

Meta's list of ESI sources also does not include Meta's Manifold (appears to be an internal file-storage similar to S3), which is referenced in Meta produced documents including on a reproduced document Bates labeled Meta_Kadrey_00065314.00010.

Please confirm that you have conducted or will be conducting a search for responsive information of Meta's Manifold.

Thank you.

Best,
Aaron

Aaron Cera
Associate



601 California Street, Suite 1505
San Francisco, CA 94108
T 415.500.6800 x909
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From: Aaron Cera <aCera@saverilawfirm.com>
Sent: Friday, September 20, 2024 6:49 AM
To: Stameshkin, Liz <lstameshkin@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Lauter, Judd <jlauter@cooley.com>; Ghajar, Bobby A. <bghajar@cooley.com>; adunning@cgsh.com <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>
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Christopher Young <cyoung@saverilawfirm.com>; julwick@dicelolevitt.com
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<ndjordjevic@dicelolevitt.com>; David Straite <dstraite@dicelolevitt.com>

Subject: Re: Kadrey v. Meta: Disclosure of Data Sources

Counsel,

Thanks for providing this information.

We note that this list does not include Text Messages or WhatsApp Messages. We believe Meta had a duty to preserve this material and search it for responsive material. Fed. R. Civ. P. 34.

Please confirm that you have conducted or will be conducting a search for text messages and WhatsApp messages. Thank you.

Best,
Aaron

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Associate



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From: Stameshkin, Liz <lstameshkin@cooley.com>
Sent: Thursday, September 19, 2024 6:00 PM
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Subject: RE: Kadrey v. Meta: Disclosure of Data Sources

External (lstameshkin@cooley.com)

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Counsel,

Further to Plaintiffs' request, Meta identifies the following data sources within its possession, custody or control that have been searched and/or collected from to identify potentially responsive or relevant documents or ESI:

- Email
- Workplace Chat
- Contracts
- Google Suite
- Workplace Groups
- Workplace Posts
- Workplace Notes
- Cooley LLP email
- Clearly Gottlieb email
- Public Meta websites (e.g., research.facebook.com, ai.meta.com)
- Research Reviews
- Single Review Tool (SRT)
- GitHub
- Research Super Cluster (RSC)
- S3 (AWS servers)

Best,

Liz

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